

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION, §  
§  
Plaintiff, §  
§  
v. §  
§  
STANFORD INTERNATIONAL BANK, LTD., §  
STANFORD GROUP COMPANY, §  
STANFORD CAPITAL MANAGEMENT, LLC, §  
R. ALLEN STANFORD, JAMES M. DAVIS, and §  
LAURA PENDERGEST-HOLT, §  
§  
Defendants. §

Case No.:

*3-09-cv-  
00298-L*

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**RECEIVER'S MOTION TO ADD RELIEF DEFENDANTS**

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Ralph S. Janvey, Receiver, moves to add Stanford Financial Group ("SFG") and The Stanford Financial Group Bldg Inc. ("SFGBI") as Relief Defendants in the above-named and numbered case.

1. For good cause shown, the court today issued an order that, among other things, placed Stanford International Bank, Ltd., Stanford Group Company, Stanford Capital Management, LLC, R. Allen Stanford, James M. Davis, and Laura Pendergest-Holt ("the Defendants") in receivership and appointed Ralph S. Janvey receiver ("Receiver Janvey").

2. To carry out his duties, including the safeguarding of receivership estate records and assets, Receiver Janvey must have access to and be able to exert complete control over all physical locations of such records and assets. Receiver Janvey has learned, upon information and belief, that certain business locations of the Defendants are held in the name of and/or


controlled by SFG and/or SFGBI. Two such offices, located at 5050 Westheimer and 5051 Westheimer in Houston, Texas, are important operating centers for the entities in receivership and, upon information and belief, the site of important records, which, if lost, would cause irreparable harm to the Receivership Estate. The Receiver needs control over SFG and SFGBI in order to assure access to and control over the various worldwide locations owned or controlled by SFG and SFGBI, wherever they be located.

#### **PRAYER**

Accordingly, Receiver Janvey requests that SFG and SFGBI be made Relief Defendants herein and made subject to the Court's Temporary Restraining Order, Order Freezing Assets, Order Requiring an Accounting, Order Requiring Preservation of Documents, and Order Authorizing Expedited Discovery and the Court's Order Appointing Receiver. Receiver Janvey also requests such other relief to which he may be entitled.

Respectfully submitted,

BAKER BOTTS L.L.P.

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JANVEY

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	§	
Defendants.	§	

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**ORDER**

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On the motion of Ralph Janvey, Receiver, the Court orders that Stanford Financial Group (“SFG”) and The Stanford Financial Group Bldg Inc. (“SFGBI”) are added as Relief Defendants herein and made subject to the provisions of the Court’s Temporary Restraining Order, Order Freezing Assets, Order Requiring an Accounting, Order Requiring Preservation of Documents, and Order Authorizing Expedited Discovery and the Court’s Order Appointing Receiver, both signed February 16, 2009.

Signed this \_\_ day of February 2009.

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United States District Judge